UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

APR 1 5 2015

CERTIFIED MAIL – RETURN RECEIPT REQUESTED
Article Number: 7000 1530 0002 6198 9801

Mr. Rick DeVolder, Director of Operations
Garlock Sealing Technologies, LLC
1666 Division Street
Palmyra, NY 144533

RE: Request for Information (RFI) Pursuant to Section 308 of the Clean Water Act
Garlock Sealing Technologies (NY0000078)
Docket No. CWA-IR-15-023

Dear Mr. DeVolder:

On February 27, 2015 the United States Environmental Protection Agency (EPA) conducted a Compliance Evaluation Inspection (CEI) at the Garlock Sealing Technologies facility located at 1666 Division Street in Palmyra, New York (the "Facility"). The purpose of the CEI was to evaluate the Facility's compliance with its New York State Department of Environmental Conservation (NYSDEC) State Pollution Discharge Elimination System (SPDES) Permit, NY0000078.

The EPA is charged with the protection of human health and the environment under the Clean Water Act (CWA or Act), 33 U.S.C. §§ 1251 et seq. Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the CWA, EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances.

You are hereby required, pursuant to Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to submit to EPA the following information regarding the subject Facility no later than **forty-five (45) calendar days** of receipt of this RFI:

1. A formal, written response to the enclosed CEI Report (including photo documentation, where applicable) that describes how the Potential Noncompliance Items and Areas of Concern have been or will be addressed;

2. Identification of all pipe destinations that the Facility was unable to field verify at the time of the 1999 drainage study; and

3. An updated flow schematic and/or drainage map with accompanying written documentation that describes all potential waste streams and sources of flow to each outfall. Potential waste streams and sources of flow include regular discharges as well as episodic discharges to floor drains, roof drains, and any ground surfaces that are tributary to an outfall at the Facility.

All information required to be submitted by this RFI shall be sent by certified mail or its equivalent to the following address:

Doughlas McKenna, Chief
Water Compliance Branch
Division of Enforcement and Compliance Assistance
United States Environmental Protection Agency
290 Broadway, 20th Floor
New York, NY 10007-1866

Any documents to be submitted by you must be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 C.F.R. § 122.22), and shall include the following certification:

> **"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine and imprisonment for knowing violations."**

Failure to provide the required information may subject the facility to civil/criminal penalties pursuant to Section 309 of the CWA. Failure to comply with the RFI shall also subject the Facility to ineligibility for participation in work associated with Federal contracts, grants or loans.

Enclosed is a copy of the CEI Report detailing EPA's findings from the February 27, 2015 CEI.

If you have any questions regarding this Request for Information or the enclosed CEI Report, please feel free to contact Katherine Mann of my staff via phone at (212) 637-4226 or via email at mann.katherine@epa.gov.

Sincerely,

Doughlas McKenna, Chief
Water Compliance Branch

Enclosure

cc: Joseph DiMura, P.E, Director, Bureau of Water Compliance Programs, NYSDEC w/enclosure
Nancy Rice, Environmental Engineer, Division of Water NYSDEC Region 8, w/enclosure (electronic)
Carrie SanAngelo, Environmental Health and Safety Coordinator, Garlock Sealing Technologies, w/enclosure (electronic)

EPA

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Form Approved.
OMB No. 2040-0057

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	3 NY 0 0 0 0 0 7 8 11	12 1 5 0 2 2 7 17	18 C	19 R	20 2

Remarks

21 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating			Reserved
67 1 69	70	71 B1	72 QA	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(for industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Garlock Sealing Technologies 1666 Division Street Palmyra, NY 14522	9:00 AM / 2/27/15	Renewal 3/1/2014
	Exit Time/Date	Permit Expiration Date
	1:45 PM / 2/27/15	2/28/2019

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data
David Samsonik, Manufacturing Supervisor, (315) 597-3057; Larry VanHoesen, Wastewater Operator, (315) 597-3392; Pete Orlando, Facilities Specialist; Carrie SanAngelo, EHS; Marc Rosen, Manufacturing Engineer	Lat, Long: 43.068828, -77.223631 SIC Codes: 3053 (Gaskets, Packing and Sealing Devices) and 2822 (Synthetic Rubber)

Name, Address of Responsible Official/Title/Phone and Fax Number(s)	Contacted	
Rick DeVolder, Director of Operations Garlock Sealing Technologies, LLC	Yes	X No

Section C: Areas Evaluated During Inspection ***(Check only those areas evaluated)***

	Permit		Flow Measurement	X	Operations & Maintenance		CSO/SSO (Sewer Overflow)
	Records/Reports		Self-Monitoring Program		Sludge Handling/Disposal		Pollution Prevention
X	Facility Site Review		Compliance Schedules		Pretreatment		Multimedia
	Effluent/Receiving Water		Laboratory	X	Storm Water		Other:

Section D: Summary of Findings/Comments ***(Attach additional sheets of narrative and checklists as necessary)***

Also present on site: Nancy Rice, Environmental Engineer 1, Division of Water, NYSDEC Region 8, (585) 266-5453

See attached report.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Katherine Mann, Physical Scientist	EPA/DECA-WCB/ (212) 637-4226 Fax (212) 637-4211	4-10-15
Signature of Management Q/A Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Justine Modigliani, Chief, Compliance Section	EPA/DECA-WCB/ (212) 637-4268 Fax (212) 637-4211	4/10/15

EPA Form 3560-3 (Rev 9-94) Previous editions are obsolete

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2, DECA-WCB
20th Floor, 290 Broadway, NY, NY 10007

Compliance Evaluation Inspection: Garlock Sealing Technologies
Inspection Date: February 27, 2015 **Inspection Time:** 9:00 AM – 1:45 PM
EPA Inspector: Katherine Mann, Physical Scientist, USEPA Region 2, DECA, Water Compliance Branch, (212) 637-4226
NYSDEC Representative: Nancy Rice, Environmental Engineer 1, Division of Water, NYSDEC Region 8, (585) 266-5453
Site Representatives: David Samsonik, Manufacturing Supervisor, (315) 597-3057; Larry VanHoesen, Wastewater Operator, (315) 597-3392; Pete Orlando, Facilities Specialist; Carrie SanAngelo, EHS; Marc Rosen, Manufacturing Engineer
Site Information: Garlock Sealing Technologies 1666 Division Street Palmyra, NY 14522 SPDES No. NY0000078 **Owner/Operator:** Garlock Sealing Technologies, LLC 1666 Division Street Palmyra, NY 14522

A. INTRODUCTION:

On February 27, 2015, the United States Environmental Protection Agency (EPA) conducted a Compliance Evaluation Inspection (CEI) at the Garlock Sealing Technologies, LLC ("Garlock") facility located at 1666 Division Street in Palmyra, New York (the "Site" or "Facility"). Also present for the CEI was Ms. Nancy Rice of the New York State Department of Environmental Conservation (NYSDEC). Garlock conducts industrial activity at the Facility under SIC codes 3053 (Gaskets, Packing and Sealing Devices) and 2822 (Synthetic Rubber). The purpose of the CEI was to evaluate Garlock's compliance with its NYSDEC State Pollutant Discharge Elimination System (SPDES) Permit, No. NY0000078 (the "Permit"), which authorizes the discharge of industrial wastewater, sanitary wastewater, and stormwater from specific outfalls at the Facility to Red Creek. The Permit renewal became effective on March 1, 2014 and will expire on February 28, 2019.

Below, please find a summary table of the outfalls and respective discharges authorized under the Permit:

Outfall ID	Authorized Discharges(s) under NY0000078
005	Boiler Blowdown and Cooling Water Drain
008	Process Wastewater, Non-Contact Cooling Water, Stormwater
010	Non-Contact Cooling Water and Stormwater
011	Sanitary Wastewater, Process Wastewater, Non-Contact Cooling Water, Stormwater
012	Stormwater
013	Stormwater
017	Stormwater
018	Stormwater

Upon entering the Facility on February 27th, the EPA inspector presented credentials to Mr. David Samsonik, Manufacturing Coordinator, and Ms. Carrie SanAngelo, Environmental Health and Safety Coordinator, and performed a walk-through of the Facility. Other Facility representatives present during the CEI include Mr. Larry VanHoesen, Mr. Pete Orlando, and Mr. Marc Rosen. Weather conditions at the time of the February 2015 inspection were sunny and freezing with approximately three (3) feet of snow cover.

On March 30, 2015, Ms. SanAngelo electronically transmitted information requested at the time of the CEI to EPA, including, but not limited to the following: drainage maps generated from a 1999 drainage assessment at the Facility; a 2007 utility plan for the new Klozure building that identifies drainage sources to outfall 018; training records; a copy of the Best Management Practices (BMP) Plan (updated March 2015); and information about the oil and water separator in the Mill and Calendar building. Information obtained from the review of the materials provided was incorporated into the findings described in this CEI report, below.

FINDINGS & OBSERVATIONS:

The following potential noncompliance items and areas of concern were identified at the time of the CEI or during review of materials submitted thereafter:

Potential Noncompliance Items

1. Paragraph 1 of the Permit (page 8) states that the permittee shall develop, maintain and implement a BMP Plan that includes the 13 minimum BMPs and any necessary plot plans, drawings or maps. Paragraph 2 (page 8) states, among other things, that the BMP Plan shall be reviewed annually and shall be modified whenever actual releases indicate the plan is inadequate, or a letter from the Department identifies inadequacies in the plan. The following BMP Plan items were not adequately developed and/or were not fully implemented at the time of the CEI:

    a. Paragraph 4 of the Permit (page 8) states the following: “Whenever the potential for a release of pollutants to State waters is determined to be present, the permittee shall

identify BMPs that have been established to prevent or minimize such potential releases. Where BMPs are inadequate or absent, appropriate BMPs shall be established." Based on review of discharge monitoring reports (DMRs), there was an oil and grease exceedance at outfall 011 in fourth quarter 2014 attributed to maintenance activities. At the time of the CEI, Site representatives stated that discharges to the floor drain in the maintenance garage do not pass through an oil and water separator prior to discharging to the on-site wastewater treatment plant. The 2015 BMP Plan also does not include any BMP(s) for this location. BMP(s) (e.g., installing and maintaining an oil/water separator, or covering the drain during maintenance activities and promptly cleaning up spills before they enter the drain) must be selected and implemented to ensure the effluent limits at outfall 011 are not exceeded.

b. Section 4.4 of the 2015 BMP Plan, Employee Training, states that the BMP Pollution Prevention Team will receive training on the contents of the BMP Plan at least yearly. While Mr. VanHoesen receives regular training as the licensed operator of the wastewater treatment plant, documentation of annual training for pollution prevention team members on the BMP Plan was not available at the time of the CEI.

   Note: Included in the information submitted on March 30th is a "Toolbox Talk" outline for an employee training session focusing on BMP Plan material.

c. Section 4.7 of the 2015 BMP Plan, Preventative Maintenance, does not include maintenance procedures for the oil and water separator located in the Mill and Calendar building. In addition, the 2015 BMP Plan does not include procedures for cleaning catch basins and storm sewer pipes, as well as cleaning and/or replacing filter fabric placed in catch basins on site. According to Garlock representatives, installation of filter fabric in the catch basins draining to Outfall 017 have significantly improved Total Suspended Solids (TSS) issues experienced at Outfall 017 in recent years.

d. Section 4.9 of the 2015 BMP Plan, Materials/Waste Handling, Storage and Compatibility, states that the Facility is cognizant of the need to utilize proper containers and storage for waste, oil, raw materials and chemicals at the Site, but does not identify container types or storage protocols for specific materials and wastes.

e. Section 4.11 of the 2015 BMP Plan, Erosion and Sediment Control, states that prior to commencing construction activity at the Site, an evaluation is conducted to ensure compliance with the Permit and with BCP Site and Soil Management Plans. However, the BMP Plan does not identify the types of projects that require development of a Stormwater Pollution Prevention Plan (SWPPP) (e.g., disturbance of over an acre of uncontaminated soil that discharges to surface water), nor does it identify any specific erosion and sediment controls (e.g., silt fencing, inlet protection) utilized at the Facility for smaller projects less than one acre. The BMP Plan also does not identify whether the Facility requires contractors performing construction work to ensure erosion and sediment controls are properly implemented.

f. The Garlock site plan map included in the BMP Plan is not up to date. In addition, it is strongly recommended that the Facility's outfalls are identified on the site plan map maintained with the BMP Plan.

2. At the time of the CEI, Site representatives stated that Outfall 018 samples are taken at the outfall from the stormwater management pond located near the northwest corner of the Site, which discharges to a ditch leading to Outfall 018; however, there are two pipes located upstream of the pond outfall that, if discharging, would flow into the ditch leading to Outfall 018. Sampling at the pond outfall would not capture potential pollutants contained in discharge(s) from the pipes. During the CEI, Facility representatives stated that the pipes do not discharge, and plugging the pipes was discussed; however, the sources of potential flow to the pipes were unknown. As previously mentioned, a utility map identifying the piping network draining towards Outfall 018 was provided at the time of the CEI. While the two pipes were not clearly identified on the map, the map suggests that there is a potential for flows to Outfall 018 from sources other than those passing through the stormwater management pond. The Facility must sample at a location that is representative of all waste streams discharging from Outfall 018 (e.g., in the ditch, downstream of the pipes and the pond outfall).

Areas of Concern

3. The flow schematic found on page 16 of the Permit, which identifies the sources of flow to each permitted outfall and approximate volumes, is outdated and does not accurately identify flows at the Facility. Modifications that have been made at the Facility and are not reflected in the flow schematic include, but may not be limited to, the following:

    a. Boiler blowdown no longer discharges from Outfall 005 and is now conveyed to the wastewater treatment plant, discharging to Red Creek via Outfall 011. Per Ms. SanAngelo's March 30, 2015 email, the boiler blowdown line from the power house to Outfall 005 was permanently closed on March 12, 2015.

    b. The cooling tower formerly discharging to Outfall 005 has been removed. Outfall 005 now would be used only as a pressure release line to divert Canandaigua Lake water if the water supply line for the Village of Palmyra or Garlock Facility required maintenance.

    c. The tert-butyl acetate solvent recovery system no longer flows to Outfall 008, and instead flows to the wastewater treatment plant and ultimately Outfall 011.

    d. Cooling water from the lab cistern in Building 19 is now directed to Outfall 008.

    e. According to Facility representatives, Outfall 010 receives only stormwater and does not receive non-contact cooling water.

    f. Outfall 013 has been plugged since fourth quarter 2012 and does not discharge.

In addition to inaccuracies in the schematic, the wastewater types described in the permit limits, levels and monitoring section (pages 2-7) of the Permit are inconsistent with the actual waste streams flowing to each outfall.

An accurate and complete assessment of waste streams to each outfall is imperative in order to ensure the monitoring parameters and effluent limits in the Permit are accurate indicators of whether discharges from the Facility are meeting New York State water quality standards. As previously mentioned, maps generated from a 1999 drainage assessment at the Facility were provided subsequent to the CEI; however, changes in flow have been made since 1999, and the destinations of a number of pipes were not field verified in 1999. In addition, pages of the map that include the color codes defining which colored lines (pipes) flow to which outfalls were not included with the submittal and could not be located at the Facility.

4. At the time of the CEI, Facility representatives stated that the wastewater treatment plant receives stormwater water runoff from roof drains. During high flow events, the former wastewater treatment tank can be used to hold excess flows up to 100,000 gallons. The BMP Plan identifies evaluating segregating of stormwater discharges to the wastewater treatment plant as an example project that would fall under the responsibilities of the BMP Pollution Prevention Team; however, during the CEI it appeared that the facility had not identified all of the roof drainage sources to the plant or evaluated how to remove them.

5. As identified in photograph P2270025, uncovered dumpsters for rubber and trash collection were identified on the east side of the Facility. Although no catch basins were observed in the immediate downstream vicinity of the dumpsters at the time of the CEI, catch basis in the parking lot near the dumpsters drain to Outfall 017. Dumpsters containing waste materials such as rubber and trash should be covered in order to prevent exposure to stormwater and the transport of pollutants to surface water bodies.

Findings identified at the time of the CEI were discussed with Mr. Samsonik, Ms. SanAngelo and Mr. Orlando at the close of the CEI.

Within forty-five (45) calendar days of receipt of this CEI report, please provide a written response detailing how the Potential Non Compliance Items and Areas of Concern listed in paragraphs 1-5, above, have been or will be addressed.

B. ATTACHMENTS:

1. Photograph Log
2. Photographs

Attachment 1: Photograph Log

Unedited photos taken by Katherine Mann, Physical Scientist, DECA-WCB, USEPA Region 2 on February 27, 2015 with Olympus TG-830 digital camera. Note: Date/time setting on camera is 12 hours behind.

P2260001	Stormwater management pond (snow covered) near Outfall 018
P2260002	Ditch to Outfall 018
P2260008	Pumps conveying water from microcellular leach to the power house
P2260009	Outfall 013 (snow covered)
P2260011	Some of the waste streams draining to Outfall 008
P2260012	Waste streams draining to Outfall 008
P2270015	Drain in maintenance garage requiring BMP(s); absorbent pads upstream of the drain appeared to be saturated. Discharges to the drain do not flow through an oil and water separator prior to conveyance to the wastewater treatment plant.
P2270017	Catch basin upstream of Outfall 010
P2270019	Sludge holding tank at wastewater treatment plant – sludge pumped out twice per year and transported to the Ontario or Canandaigua wastewater treatment plants; last pumped-out in December 2014
P2270021	Final effluent from wastewater treatment plant (~24 gpm) (flows to Outfall 011)
P2270023	Outfall 017 frozen and snow covered
P2270024	Snow-covered asphalt pile located near outfall 017; all other stockpiles had been removed at the time of the CEI. No catch basins were observed in the immediate vicinity.
P2270025	Uncovered dumpsters for trash and rubber located on the east side of the Site. At the time of the CEI, no catch basins were observed downstream of this location; however, stormwater runoff draining to the catch basins in the parking lot near the dumpsters drains to Outfall 017.
P2270026	Snow covered catch basin with filter fabric in the parking lot draining to Outfall 017
P2270028	Sump/containment pit collecting oily water from the ~30’ press in the Mill & Calendar building. Oily water is pumped from the pit to the oil/water separator.
P2270029	Oil/water separator with scraper tube that draws out oil and transports it to a 55-gallon drum. According to the March 30, 2015 email from Ms. SanAngelo, the facility collects approximately one (1) 55-gallon drum of oil from the oil/water separator per month.
P2270030	2” pipe that directs water collected from the oil/water separator to a floor trough/drain, which ultimately transports it to the wastewater treatment plant
P2270031	Pipe conveying water from the oil/water separator with discharge to a trough. According to Facility representatives, and identified on the site drainage map provided, there is a floor drain in the trough that conveys the water to the wastewater treatment plant.

Attachment 2: Photographs

P2260001

P2260002

P2260008

P2260009

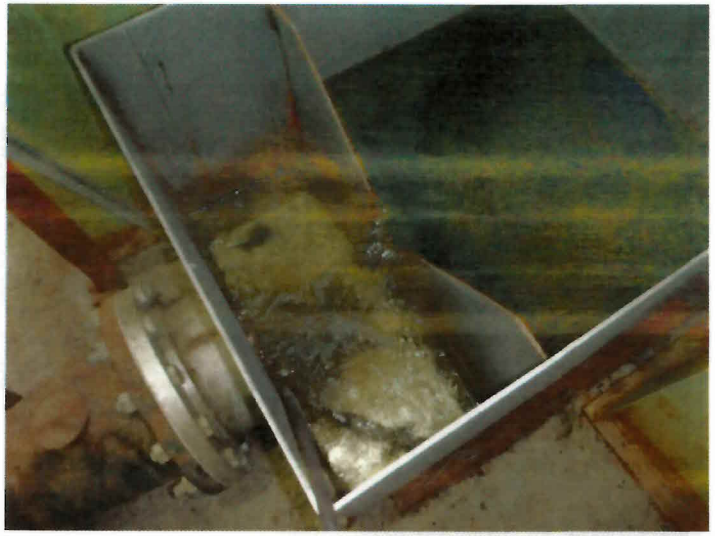
P2260011

P2260012

P2270015

P2270017

P2270019



P2270021

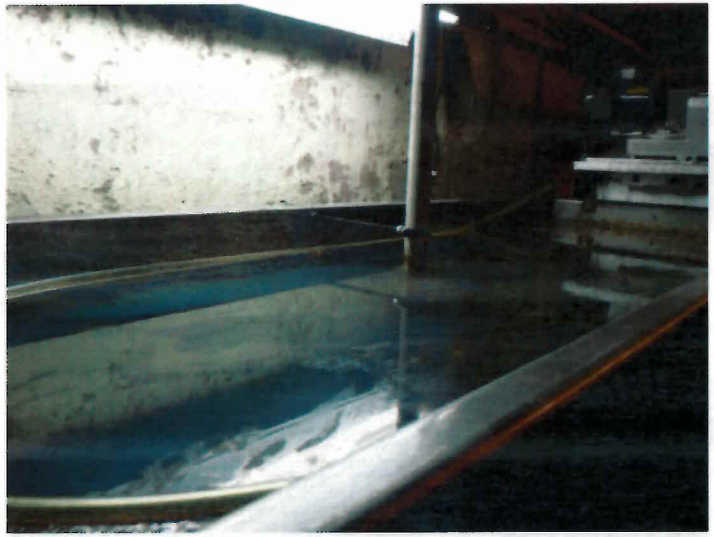
P2270023

P2270024

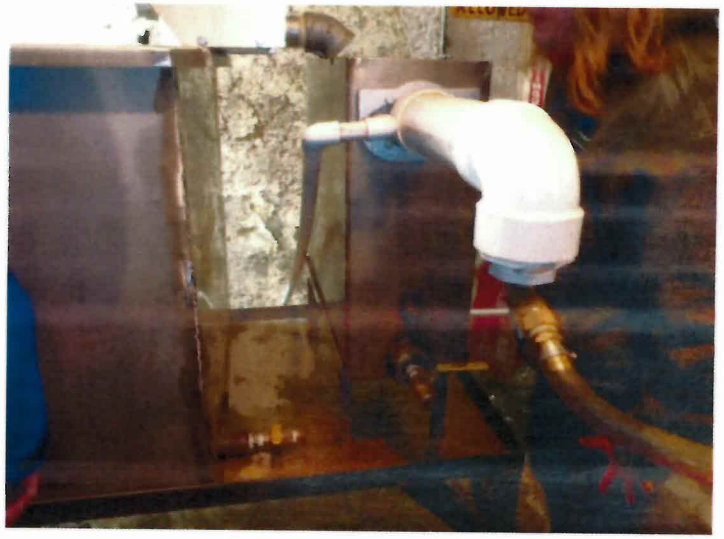
P2270025

P2270026

P2270028



P2270029



P2270030

P2270031